

HEATHER E. WILLIAMS, #122664
Federal Defender
DOUGLAS BEEVERS, #288639
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: (916) 498-5700
Fax: (916) 498-5710
Douglas_Beevers@fd.org

Attorney for Defendant
SAM MOSS KERFOOT

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:23-CR-00269-DAD
)	
Plaintiff,)	STIPULATION AND ORDER TO CONTINUE
)	STATUS CONFERENCE AND EXCLUDE
vs.)	TIME
)	
SAM MOSS KERFOOT,)	Date: July 16, 2024
)	Time: 9:30 a.m.
Defendant.)	Judge: Dale A. Drozd
)	
)	

IT IS HEREBY STIPULATED by and between Phillip A, Talbert, United States Attorney, through Assistant United States Attorney Emily Sauvageau, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Douglas Beevers, attorney for Sam Moss Kerfoot, that the status conference, currently scheduled for May 14, 2024, be continued to July 16, 2024 at 9:30 a.m.

Defense counsel requests additional time to review protected discovery. The parties believe a continuance to July 16, 2024, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and finalize any further pre-plea negotiations.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded of this order's date through and including July 16, 2024; pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

1 Counsel and the defendant also agree that the ends of justice served by the Court granting
2 this continuance outweigh the best interests of the public and the defendant in a speedy trial.
3

4 Respectfully submitted,

5 Dated: May 8, 2024

6 HEATHER E. WILLIAMS
7 Federal Defender

8 /s/ Douglas Beevers
9 DOUGLAS BEEVERS
10 Assistant Federal Defender
Attorney for Defendant
SAM MOSS KERFOOT

11 Dated: May 8, 2024

12 PHILLIP A. TALBERT
United States Attorney

13 /s/ Emily Sauvageau
14 EMILY SAUVAGEAU
15 Assistant U.S. Attorney
Attorney for Plaintiff
16
17
18
19
20
21
22
23
24
25
26
27
28

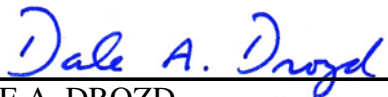
ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including July 16, 2024, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the May 14, 2024 status conference shall be continued until July 16, 2024, at 9:30 a.m.

IT IS SO ORDERED.

Dated: May 8, 2024



DALE A. DROZD
UNITED STATES DISTRICT JUDGE